

### REMARKS

The specification has been amended to insert application serial numbers for the patent applications referred to therein.

Claims 1-27 remain active in the case. By the present Amendment, Claims 1, 14 and 24 have been amended to recite the invention with greater clarity so as to better distinguish over the cited art of record; and Claim 28 has been cancelled to expedite prosecution. Applicants have carefully considered the cited references and the Examiner's comments, and believe the claims currently in the case patentably distinguish over the references and are allowable in their present form. Reconsideration of the rejection is, accordingly, respectfully requested in view of the above amendments and the following comments.

Claims 1-26 stand rejected under 35 U.S.C. 103(a) as being unpatentable over DeLorme et al. (U.S. Patent No. 5,848,373) in view of Victor et al. (U.S. Patent No. 4,751,380), DeLorme et al. (U.S. Patent No. 6,321,158) and Lamoure (U.S. Patent No. 5,416,312).

Claim 1 is directed to a system for retrieving position-related information. The system comprises a map that includes a representation of a particular geographical area, and an address pattern comprising a pattern of dots that is "disposed throughout said representation of the particular geographical area". Furthermore, each specific geographical location within the geographical area is associated with a unique portion of the address pattern and can be identified from the associated unique portion of the address pattern. An electronic reading device optically detects a portion of the

address pattern and a server identifies a specific geographical location corresponding to the detected portion of the address pattern.

Thus, according to Claim 1, the pattern of dots comprising the address pattern is disposed throughout an entire geographical area, and unique portions of the pattern of dots can identify specific geographical locations within the geographical area. None of the references, considered alone or in combination, discloses or suggests this structure of Claim 1.

DeLorme ('373) discloses a map that is overprinted with equal area grid quadrangles. Each grid quadrangle is identified by a unique name stored in a database such that in response to a user inquiry, a selected grid quadrangle that is correlated with a grid quadrangle of a printed map can be displayed. According to DeLorme ('373), the invention permits locatable objects to be displayed on selected grid quadrangles, and, in addition, a user location and route can be displayed using GPS or the like.

As is recognized by the Examiner, DeLorme ('373) does not disclose an address pattern comprising a pattern of dots disposed throughout a representation of a geographical area. In addition, it is submitted that DeLorme ('373) also does not disclose or suggest that specific geographical locations in the geographical area are associated with unique portions of the address pattern that can be optically detected by an electronic reading device to identify corresponding geographical locations. As indicated above, DeLorme ('373) discloses only that the grid quadrangles are identified by unique names stored in a database. There appears to be no disclosure that, or any

reason why, the grid quadrangles would be distinguishable by an electronic reading device that optically detects the address pattern portions.

The Examiner applies Lamoure as disclosing a pattern of dots. However, Lamoure discloses that these dots comprise groupings of dots placed on a document in the vicinity of associated areas, and that they form codes for the associated areas. Lamoure does not disclose an address pattern comprising a plurality of dots disposed throughout a representation of a geographical area. Furthermore, there would appear to be no reason to combine the references to replace the grid quadrangles of DeLorme ('373) with dots because an objective in DeLorme ('373) is to be able to identify each grid quadrangle over printing a map with a unique name so that it can be identified and displayed.

Victor discloses an electronic reading device for moving over a surface having a grid pattern in a detector system, but otherwise does not appear pertinent to the present invention and does not supply the deficiencies in the principal references described above.

DeLorme ('158) is applied as disclosing a server that sends information relating to a specific geographical location to an electronic device but otherwise also fails to supply the deficiencies in the principal references as described above.

In general, none of the references discloses or suggests identifying unique portions of an address pattern that is comprised of a pattern of dots using an electronic reading device that optically detects a portion of the pattern of dots so that a server can identify a specific geographical location

corresponding to the detected portion of the address pattern. Independent Claim 1, accordingly, should be allowable over the references in its present form.

Claims 2-13 depend from and further restrict Claim 1 and should also be allowable, at least by virtue of their dependency.

Independent Claim 14 has been amended to also clarify that an address pattern comprising a pattern of dots is disposed throughout a representation of a geographical area, and that a position on the address pattern can be optically detected by an electronic reading device in order to identify a geographical location within the geographical area that corresponds to the position. For substantially the same reasons as discussed above, Claim 14 is neither disclosed nor suggested by any of the references, considered alone or in combination, and should be allowable in its present form.

Claims 15-26 depend from and further restrict Claim 14 and should also be allowable. With respect to Claim 16, in particular, this claim recites the additional step of authenticating a user identity based on data received from the electronic reading device. In rejecting this claim, the Examiner refers to the rejection of Claims 1-3 which do not relate to user authentication. Claim 16 is believed to be allowable in its own right as well as by virtue of its dependency.

Independent Claim 27 is rejected under 35 U.S.C. 103(a) as being unpatentable over Victor in view of DeLorme ('373) and Lamoure. In rejecting the claim, the Examiner states that Victor discloses a method for producing a map comprising assigning each position of a selected optically detectable address pattern to a corresponding geographical location, and refers to Cols. 3-4, lines 67-45 of Victor. Applicant's have examined this portion of Victor and have been unable to find any such

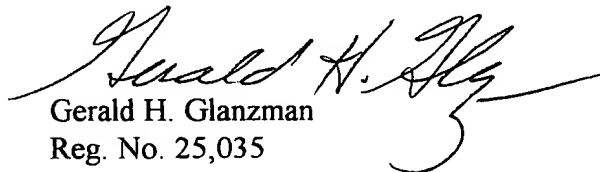
Serial No. 09/703,481  
Docket No. 34650-00658USPT  
Client No. P13641

teaching. The Examiner further states that Victor discloses identifying a region of the selected address pattern that corresponds to a geographic area to be presented on a map, and refers to Cols. 5-7, lines 49-14 of Victor. Again, Applicants are unable to find any such teaching in the referred to portion of Victor or anywhere else in Victor. Applicants submit that Victor does not disclose or suggest a method for producing a map, and in no way suggests the invention of Claim 27 either alone or in combination with the secondary references. Claim 27 should also be allowable in its present form.

For all the above reasons, Claims 1-27 are believed to patentably distinguish over the references and to be allowable in their present form, and it is respectfully requested that the Examiner so find and issue a Notice of Allowance in due course.

Respectfully submitted,

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